

Center for Environmental Health
528 61st Street, Suites A and C
Oakland, CA 94609
30 June, 2004

Ms. Tam Dudoc
Deputy Secretary for Environmental Quality
1001 "I" Street, 25th Floor
Sacramento, CA 95814

Dear Ms. Dudoc,

The Center for Environmental Health is an independent advocacy organization focused on promoting health by preventing pollution. For the past eight years, we have worked directly with corporations, major purchasers, and government agencies to reduce toxic emissions into our environment. We applaud Cal/EPA's ongoing work on the EJ Action Plan, and support the two-pathway approach proposed by the EJ Program Staff, with the suggestions below.

Re: Priority 1: "Provide Guidance on Cal/EPA Precautionary Applications"

As currently practiced, risk assessment is not a precautionary tool. In addition, many organizations nation-wide, including the National Environmental Justice Advisory Committee, agree that traditional risk assessment is scientifically outdated. To meet the health needs of Californians and to be on the cutting edge of science for policy applications, EJ Program Staff should use cumulative impacts as an alternative to risk assessment. Cumulative impacts analysis is a precautionary tool that addresses the many factors influencing toxic chemicals and our health.

Re: Priority 2: "Conduct Cumulative Health Impacts Reduction Plan Pilot Projects and Develop Guidance on Cumulative Impacts Analysis"

There is scientific evidence that as vulnerable populations, people of color and low income communities are more susceptible to cross-media exposures. Thus any EPA regulatory strategy must be proactive in addressing the vulnerability of the populations it seeks to protect. Due to increased incidence of other health stressors among environmental justice communities, EPA may need more stringent chemical regulations for those communities.

Re: Priority 5: "Ensure Meaningful Public Participation in Implementing EJ Action Plan"

We encourage you to build off of the communication channels built over the last few years of the EJ Recommendations process in future policy work. What we have in California is a rare model on the national scale. To preserve the integrity of the model, community-based organizations that crafted the Recommendations can serve an important consulting role in preserving the intent of the original document.

Through good process, we will improve our ability to protect the health of California's communities most affected by environmental threats.

Thank you,

Anjali Gupta
Coordinator, Community Health Program